



94-RF-05671

INCORPORATION OF OPERABLE UNIT 6 INDIVIDUAL HAZARDOUS SUBSTANCE
SITES 166 1, 166 2, 166 3 AND 167 1 INTO OPERABLE UNIT 7 (02372)
- TPO-021-94

First, incorporation of these Individual Hazardous Substance Sites (IHSSs) impact current costs and schedules for the following reasons

- Additional costs and time would be required to conduct risk assessments on the sites. This would include transfer of data from Operable Unit (OU) 6 to OU 7 personnel, calculation of contaminants of concern, data aggregation and risk assessment. This would also include modification of OU specific subcontracts and change control actions since scope would be transferred between Activity Data Sheets (ADSs).
- Development of additional documentation to report the above listed results. These results were to be evaluated and presented in the OU 6 RCRA [Resource Conservation and Recovery Act] Facilities Investigation/Remedial Investigation (RFI/RI) report. There is no equivalent document scheduled for OU 7 since the Phase I data has already been evaluated and is presented in existing documentation.

Current project schedules for OU 6 and OU 7 easily allow for coordination of this effort and text could be added to the OU 7 Interim Measure/Interim Remedial Action to allow for incorporation of these sites into the CAMU concept. If risk numbers indicate that no further action is necessary, OU 6 can develop that documentation since this is currently not in the scope for OU 7.

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I believe this methodology is more efficient and cost effective while obtaining the intended objective. Please call me to arrange a discussion regarding this or if you have any other questions.



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Original and 1 cc - J L Pepe

Attachments
As Stated